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Karen Ritland  
Forest Supervisor  
903 3rd Street  
Kamiah, ID 83536

Sent via email to: [comments-northern-nezperce@usda.gov](mailto:comments-northern-nezperce@usda.gov)

May 17, 2021

**Subject: May 4, 2021 request for comments on miscellaneous small NEPA projects**

Dear Ms. Ritland:

I am writing on behalf of the Idaho Conservation League in response to your letter, dated May 4, 2021, requesting public comments on several miscellaneous projects on the Nez Perce-Clearwater National Forests. ICL has been Idaho's leading voice for conservation since 1973. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters, many of whom have a deep personal interest in protecting human health and the environment. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development.

Enclosed, you will find my comments on behalf of ICL regarding several of the projects listed in your letter. My comments on the mining exploration projects have been submitted separately. If you have any questions, then please don't hesitate to contact me.

Sincerely,

Brad Smith  
North Idaho Director

## Flint Creek Culvert Replacements

The Idaho Conservation League supports this project and any effort to improve passage for native fish or increase the access of native fish to habitat that has been fully or partially blocked by anthropogenic barriers. We also encourage the placement of gravel on the roadway at the crossing to reduce erosion and sediment delivery. Gravel should extend outward from the crossing to the edge of the INFISH or PACFISH riparian buffer.

## McBee Special Use Permit

The Forest Service proposes to issue a 20-year special use permit and right-of-way to Mr. McBee on FS Road 624, which is currently closed to public motorized travel. A key would be issued to Mr. McBee for use of the road to access his private inholding. The road would remain closed to the general public. The environmental analysis should describe the current condition of applicable elk management units. The Forest Service should then compare current levels of elk habitat effectiveness, when taken with the proposed action to Forest Plan objectives. If elk habitat effectiveness objectives have not been met or will be exceeded, then other open motorized roads or trails should be closed to satisfy elk habitat objectives.

## North Fork Aspen 3 & North Fork Ponderosa Pine 2

ICL supports these projects. We applaud efforts by the Forest Service and Idaho Fish and Game to enhance aspen, ponderosa pine, western larch, and whitebark pine through the use of foot crews and prescribed fire.

## Castle Creek Restoration

ICL support this project and efforts to restore fish habitat and natural stream channel form and function. The Forest Service should also consider decommissioning and obliterating the road and trail 420 to further improve water quality and fish habitat. Doing so would reduce erosion and sediment delivery to the stream and provide more room for Castle Creek to access its historic flood plain.

## Musselshell Beaver Dam Analogs Phase 3

ICL supports this project and efforts to restore stream channel form and function to a more natural condition.

## Musselshell Meadow Fence Reroute

While ICL appreciate the good intent behind this project proposal, a better option would be to retire the grazing allotment.

## O'hara Bridge Replacement

ICL would like to thank the Forest Service for designing the replacement bridge without a center pier. As the agency observed in the scoping notice, the existing center pier impedes debris flow and limits aquatic habitat potential.

### **Purdue Drift Fence**

While we appreciate the Forest Service's good intent behind this project, we urge the agency to discuss the potential to retire this allotment with the permittee. Not only does it appear that tax payers will foot the bill, but grazing has also heavily impacted water quality and fish on the Palouse Ranger District. Retiring this allotment would potentially improve water quality and fish and wildlife habitat.

### **Walde Creek Culvert Replacement**

ICL support this project and efforts to improve fish passage at locations where fish migration or access has been partially or fully blocked by anthropogenic barriers.

### **Whitebark Pine Planting**

ICL supports this project and efforts to restore declining stands of whitebark pine.